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Attorney for Plaintiffs

UNITED STATE DISTRICT COURT  
FOR DISTRICT OF NORTHERN CALIFORNIA

DANIEL CAI & TOM TANG

Plaintiff,

vs.

CCL GROUP INC., DBA YOTAKA SUSHI  
BAR & GRILL, EVELYN TANG, DOES 1 TO  
10,

Defendants

Case No.: C07-06444 JL  
C06-07912 JL

**DECLARATION OF ADAM WANG IN  
SUPPORT OF MOTION FOR LEAVE TO  
FILE A FIRST AMENDED COMPLAINT**

Date: September 3, 2007  
Time: 9:30 AM  
Judge : Honorable James Larson  
Trial Date: None

I, the undersigned, declare as follows:

1. I am duly licensed to practice law in the State of California, am the attorney of record for Plaintiffs in this case. I have personal knowledge of the facts stated herein and, if called upon to testify before this court, I could and would testify competently to the following facts.

2. On July 29, 2008, by registered mail with return receipt requested, I sent both California Labor and Workforce Development Agency and Defendants a letter alleging various Labor Code violations by Defendants, and indicating Plaintiffs' intension to recover unpaid wage and appropriate penalties authorized under Labor Code § 558 on behalf all former and current

DECLARATION OF ADAM WANG IN SUPPORT OF  
MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT  
Cai, et al. v. CCL Group Inc., et al.

1 employees pursuant to Private Attorney General's Act, Labor Code § 2699, *et seq.* Exhibit 1  
2 hereto is a true and accurate copy of such a letter.

3 3. To date, parties only conducted written discoveries. In their responses to  
4 Plaintiffs' interrogatories, Defendants admitted that Evenly Tang hired Plaintiff Tom Tang, and  
5 was responsible for calculating and paying both Plaintiffs.

6 4. To date, no depositions have been taken.

7 I do declare under penalty of perjury under the laws of the United States that the  
8 foregoing is true and correct.

9  
10 Date: July 28, 2008

By: /s/ Adam Wang  
Attorney for Plaintiffs

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